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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**TWENTY-SEVENTH MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD DECEMBER 1, 2021 THROUGH DECEMBER 31, 2021**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	December 1, 2021 through December 31, 2021
Amount of compensation sought as actual, reasonable, and necessary:	\$622,772.80 (80% of \$778,466.00)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$0.00 (100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this twenty-seventh monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing December 1, 2021 through December 31, 2021 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$778,466.00 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$622,772.80.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$807.23. The blended hourly rate of paraprofessionals during the Application Period is \$291.18.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$0.00 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$0.00.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$622,772.80 (80% of \$778,466.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$0.00 (100%), for a total amount of \$622,772.80 for the Application Period.

Dated: February 4, 2022
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A001	Asset Analysis & Recovery	5.6	\$5,770.50
A004	Case Administration	9.9	\$2,080.50
A006	Employment / Fee Applications	9.7	\$3,344.00
A009	Meetings / Communications with AHC & Creditors	37.1	\$46,282.50
A019	Plan of Reorganization / Disclosure Statement	79.8	\$93,338.50
A020	Insurance Adversary Proceeding	988.1	\$627,650.00
		1,130.2	\$778,466.00

Exhibit B

Summary of Compensation by Professional

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,700.00	57.7	\$98,090.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,400.00	81.5	\$114,100.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,350.00	78.5	\$105,975.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,100.00	8.6	\$9,460.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$800.00	92.3	\$73,840.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia – 2019	\$725.00	29.3	\$21,242.50
Emily Grim	Partner / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020 U.S. Court of Appeals for the Federal Circuit - 2021	\$700.00	5.1	\$3,570.00
Dan Wolf	Partner / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$700.00	15.0	\$10,500.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia - 2017	\$675.00	82.1	\$55,417.50
Adam Farra	Associate / State of Maryland – 2011 District of Columbia - 2015	\$675.00	8.9	\$6,007.50

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$575.00	69.3	\$39,847.50
Alison Gaske	Associate / District of Columbia – 2016	\$575.00	115.6	\$66,470.00
Ethan Kaminsky	Associate / State of New York – 2018	\$500.00	77.3	\$38,650.00
Christian Carey	Associate / District of Columbia – 2020	\$425.00	86.0	\$36,550.00
John Girgenti	Staff Attorney / State of New York – 2002 District of Columbia – 2007	\$365.00	63.6	\$23,214.00
Ifenanya Agwu	Law Clerk	\$200.00	35.6	\$7,120.00
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$425.00	26.0	\$11,050.00
Alyssa Bonesteel	eDiscovery Specialist – Joined firm in 2018	\$375.00	27.9	\$10,462.50
Stephanie Colcock	Paralegal – Joined firm in 2020	\$330.00	16.7	\$5,511.00
Lauren Fastenau	Paralegal – Joined firm in 2019	\$315.00	54.2	\$17,073.00
Sherley Martinez	Paralegal – Joined firm in 2017	\$315.00	19.4	\$6,111.00
Katherine Johnson	Paralegal – Joined firm in 2018	\$230.00	34.5	\$7,935.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$230.00	18.8	\$4,324.00
Michael Lloyd	Project Assistant – Joined firm in 2021	\$195.00	3.5	\$682.50
Carmen Turner	Project Assistant – Joined firm in 2021	\$195.00	14.2	\$2,769.00
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$290.00	8.6	\$2,494.00
	Totals		1,130.2	\$778,466.00
	Attorney Blended Rate	\$807.23		
	Paraprofessional Blended Rate	\$291.18		

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
N/A	\$0.00
Total	\$0.00

Exhibit D

Time and Expense Detail



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Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

February 4, 2022
Invoice Number: 11325542
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through December 31, 2021

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	778,466.00	.00	778,466.00
Total	778,466.00	.00	778,466.00

TOTAL FEES \$ 778,466.00

TOTAL EXPENSES \$.00

TOTAL FEES AND EXPENSES \$ 778,466.00

FOR PROFESSIONAL SERVICES RENDERED through December 31, 2021

Purdue Bankruptcy

A001: Asset Analysis & Recovery

Name	Date	Services	Hours	Amount
Gilbert, S.	12/01/21	Analyze insurance recovery strategy.	1.00	1,700.00
Hudson, J.	12/01/21	Revise insurance-settlement related materials for client meeting.	.50	362.50
Hudson, J.	12/01/21	Review insurance implications of recent hearing.	.10	72.50
Hudson, J.	12/03/21	Review outstanding items for insurance settlement discussions.	.10	72.50
Gilbert, S.	12/06/21	Communicate with insurance team re strategy.	.50	850.00
Hudson, J.	12/07/21	Review summary materials for call with personal injury claimants' counsel re insurance strategy.	.20	145.00
Hudson, J.	12/07/21	Confer with personal injury claimants' counsel re insurance strategy.	.60	435.00
Martinez, S.	12/07/21	Review databases re new insurance-related materials.	.20	63.00
Hudson, J.	12/08/21	Review status of confidentiality negotiations with insurers.	.10	72.50
Gilbert, S.	12/13/21	Confer with team re insurance strategy.	.20	340.00
Quinn, K.	12/13/21	Confer with team re case status and insurance recovery strategy.	.20	220.00
Shore, R.	12/13/21	Confer with S. Gilbert, K. Quinn, J. Hudson, D. Wolf, A. Gaske and S. Sraders re insurance strategy.	.20	270.00
Hudson, J.	12/13/21	Confer with team re insurance recovery strategy.	.20	145.00
Wolf, D.	12/13/21	Confer with S. Gilbert, R. Shore, K. Quinn, J. Hudson, A. Gaske, and S. Sraders re insurance recovery strategy and status.	.20	140.00
Gaske, A.	12/13/21	Confer with team re strategy and updates.	.20	115.00
Sraders, S.	12/13/21	Meet with team re insurance strategy and next steps.	.20	115.00
Hudson, J.	12/14/21	Confer with counsel for CNA re settlement in connection with collateral.	.10	72.50
Hudson, J.	12/14/21	Summarize status of settlement-related tasks.	.30	217.50
Hudson, J.	12/14/21	Revise template demand letter to insurers.	.40	290.00

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Name	Date	Services	Hours	Amount
Hudson, J.	12/16/21	Communicate with S. Gilbert re next steps for insurance settlement strategy.	.10	72.50
Project Total:			5.60	\$ 5,770.50

A004: Case Administration

Name	Date	Services	Hours	Amount
Turner, C.	12/01/21	Review insurance-related pleadings recently filed in case.	.90	175.50
Johnson, K.	12/02/21	Review case docket re orders appointing mediators.	.20	46.00
Ogrey, S.	12/06/21	Revise master list of cases filed against Debtors.	.20	46.00
Fastenau, L.	12/06/21	Organize appeals pleadings for attorney review.	.50	157.50
Colcock, S.	12/06/21	Review appeal docket for Sackler supplement appeal brief.	.20	66.00
Turner, C.	12/06/21	Review insurance-related pleadings recently filed.	2.40	468.00
Johnson, K.	12/08/21	Review case docket re Ad Hoc Committee members, PEC members, and mediators' reports.	1.40	322.00
Turner, C.	12/10/21	Calendar case deadlines.	.20	39.00
Turner, C.	12/13/21	Review recently filed insurance-related pleadings.	1.40	273.00
Turner, C.	12/14/21	Calendar late claim motion hearing and case deadlines.	.60	117.00
Turner, C.	12/20/21	Calendar objection to motion deadline.	.20	39.00
Turner, C.	12/22/21	Review insurance-related pleadings recently filed in case.	.80	156.00
Turner, C.	12/30/21	Review insurance-related pleadings recently filed in case.	.90	175.50
Project Total:			9.90	\$ 2,080.50

A006: Employment / Fee Applications

Name	Date	Services	Hours	Amount
Quinn, K.	12/01/21	Review Fee Examiners report.	.20	220.00
Holland, P.	12/01/21	Begin analyzing Fee Examiner issues re interim fee application.	.70	203.00
Holland, P.	12/02/21	Continue analyzing June - September time questioned by Fee Examiner.	3.20	928.00
Holland, P.	12/12/21	Draft October fee statement.	.80	232.00

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Name	Date	Services	Hours	Amount
Holland, P.	12/13/21	Continue analyzing Fee Examiner issues re 6th interim fee application (1.2); draft response to same (1.7); communicate with E. Grim re same (0.2).	3.10	899.00
Grim, E.	12/13/21	Revise response to Fee Examiner letter.	.40	280.00
Holland, P.	12/15/21	Finalize response to Fee Examiner report re 6th interim fee application.	.80	232.00
Grim, E.	12/15/21	Revise response to Fee Examiner letter.	.50	350.00
Project Total:			9.70	\$ 3,344.00

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	12/01/21	Confer with AHC re strategy.	.90	1,530.00
Shore, R.	12/01/21	Confer with AHC working group re settlement demands (1.3); confer with AHC re appellate issues (0.9)	2.20	2,970.00
Hudson, J.	12/01/21	Confer with Ad Hoc Committee re insurance-related updates and options following appellate hearing.	.90	652.50
Hudson, J.	12/01/21	Confer with AHC re potential insurance settlement documents.	1.30	942.50
Grim, E.	12/01/21	Confer with clients re update on appeal and strategy for moving forward.	.90	630.00
Wolf, D.	12/01/21	Confer with clients re insurance recovery strategy.	1.30	910.00
Wolf, D.	12/01/21	Confer with clients and co-counsel re appellate hearing on plan confirmation.	.90	630.00
Sraders, S.	12/01/21	Confer with Ad Hoc Committee re appeal status.	.90	517.50
Gilbert, S.	12/03/21	Confer with AHC re TDPs.	1.00	1,700.00
Gilbert, S.	12/03/21	Confer with AHC representatives re plan resolution strategy.	1.00	1,700.00
Gilbert, S.	12/07/21	Confer with AHC working group re plan.	1.00	1,700.00
Gilbert, S.	12/09/21	Confer with AHC working group re plan.	1.00	1,700.00
Gilbert, S.	12/14/21	Confer with AHC working group re plan.	1.00	1,700.00
Gilbert, S.	12/16/21	Confer with AHC working group re plan.	.70	1,190.00
Gilbert, S.	12/17/21	Confer with AHC representatives re plan issues.	1.00	1,700.00
Gilbert, S.	12/17/21	Confer with AHC working group re plan issues.	1.00	1,700.00
Gilbert, S.	12/20/21	Confer with AHC working group re plan (0.9); confer with AHC re same (1.6).	2.50	4,250.00
Quinn, K.	12/20/21	Confer with AHC re District Court decision.	1.60	1,760.00
Shore, R.	12/20/21	Confer with AHC re District Court ruling.	1.60	2,160.00
Hudson, J.	12/20/21	Confer with AHC re status and strategy.	1.60	1,160.00

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Name	Date	Services	Hours	Amount
Grim, E.	12/20/21	Confer with AHC re appeal options and strategy.	1.50	1,050.00
Wolf, D.	12/20/21	Confer with clients and co-counsel re District Court appellate ruling.	1.60	1,120.00
Sraders, S.	12/20/21	Confer with AHC re District Court opinion and next steps.	1.60	920.00
Gilbert, S.	12/21/21	Confer with AHC working group re plan issues.	1.00	1,700.00
Gilbert, S.	12/22/21	Confer with AHC re plan issues.	1.30	2,210.00
Quinn, K.	12/22/21	Confer with AHC re strategy.	1.30	1,430.00
Grim, E.	12/22/21	Confer with AHC re strategy and next steps for addressing district court ruling.	1.00	700.00
Gilbert, S.	12/28/21	Confer with AHC working group re plan issues.	1.50	2,550.00
Gilbert, S.	12/29/21	Confer with AHC re plan issues (1.0); confer with working group re same (1.0).	2.00	3,400.00
Project Total:			37.10	\$ 46,282.50

A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Wolf, D.	12/01/21	Revise supplemental briefing re appellate argument.	.50	350.00
Wolf, D.	12/02/21	Review pricing quotes re acquiring insurance for post-bankruptcy trusts.	.30	210.00
Wolf, D.	12/02/21	Confer with M. Brown and B. Kelly re insurance procurement for post-bankruptcy trusts.	.70	490.00
Gilbert, S.	12/03/21	Confer with K. Eckstein re resolution of plan issues.	1.00	1,700.00
Wolf, D.	12/06/21	Review supplemental appellate briefing re third-party releases.	1.30	910.00
Sraders, S.	12/06/21	Analyze plan and supplemental documents to determine timing and allocation of distributions.	2.00	1,150.00
Quinn, K.	12/07/21	Review summary of appellate briefing.	.40	440.00
Martinez, S.	12/08/21	Analyze trust distribution procedures re personal injury claimants.	1.70	535.50
Fastenau, L.	12/08/21	Review TDP, checklist, and flow chart for personal injury claimants.	1.20	378.00
Fastenau, L.	12/08/21	Draft check list and flowchart for TPP TDP.	1.70	535.50
Fastenau, L.	12/08/21	Review TDP for TPP claimants.	1.00	315.00
Martinez, S.	12/09/21	Confer with A. Gaske, K. Johnson, and L. Fastenau re trust distribution procedures project.	.40	126.00
Martinez, S.	12/09/21	Review hospital claimant trust distribution procedures; draft checklist re same.	.40	126.00

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Name	Date	Services	Hours	Amount
Johnson, K.	12/09/21	Confer with A. Gaske and paralegal team re TDP flow charts.	.40	92.00
Gaske, A.	12/09/21	Confer with L. Fastenau, K. Johnson, and S. Martinez re creation of checklist and flowcharts illustrating TDPs.	.40	230.00
Gaske, A.	12/09/21	Review requirements for hospitals TDP.	1.00	575.00
Fastenau, L.	12/09/21	Confer with A. Gaske, S. Martinez, S. Ogrey, and K. Johnson re TDP checklist and flowchart project.	.40	126.00
Fastenau, L.	12/09/21	Draft check list for NAS personal injury TDP.	1.50	472.50
Fastenau, L.	12/09/21	Review TDP for NAS personal injury claimants.	.90	283.50
Wolf, D.	12/10/21	Confer with H. Williford re shareholder released parties' insurance assignments.	.30	210.00
Martinez, S.	12/10/21	Finalize review of hospital claimants trust distribution procedures (0.3); finalize drafting trust distribution procedures checklist (0.5).	.80	252.00
Fastenau, L.	12/13/21	Draft check list for NAS personal injury TDP.	.80	252.00
Gilbert, S.	12/14/21	Attend NOAT meeting re trust distribution procedures.	1.00	1,700.00
Gaske, A.	12/14/21	Review checklist of requirements in NAS TDP (0.4); create flowchart for claim disbursement process (0.9).	1.30	747.50
Wolf, D.	12/15/21	Confer with B. Kelly re revisions to plan documents.	.20	140.00
Gaske, A.	12/15/21	Review flowchart for NAS TDP.	.20	115.00
Fastenau, L.	12/15/21	Revise flowchart for NAS PI TDP.	1.00	315.00
Quinn, K.	12/16/21	Participate in omnibus hearing.	2.00	2,200.00
Quinn, K.	12/16/21	Participate in call with co-counsel re District Court decision.	1.30	1,430.00
Quinn, K.	12/16/21	Initial review of District Court opinion.	.70	770.00
Quinn, K.	12/16/21	Correspond with co-counsel and professionals re implications of decision.	.70	770.00
Shore, R.	12/16/21	Review District Court decision and impact on adversary proceeding (1.0); confer with AHC co-counsel re same (1.3).	2.30	3,105.00
Grim, E.	12/16/21	Review District Court ruling vacating confirmation order.	.20	140.00
Gilbert, S.	12/17/21	Confer with K. Eckstein re plan issues.	1.00	1,700.00
Wolf, D.	12/17/21	Review District Court appellate ruling and next steps re same.	1.20	840.00
Gaske, A.	12/17/21	Revise checklist of requirements under hospital TDP (0.4); create flowchart mapping hospital TDP (0.9).	1.30	747.50

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February 4, 2022

Name	Date	Services	Hours	Amount
Gaske, A.	12/17/21	Review portion of District Court opinion re Debtors' bankruptcy plan.	.60	345.00
Gilbert, S.	12/18/21	Confer with S. Birnbaum re plan issues.	.50	850.00
Gilbert, S.	12/18/21	Confer with G. Uzzi re plan issues.	.50	850.00
Gilbert, S.	12/20/21	Confer with Sackler counsel re plan issues (1.6); confer with K. Maclay re same (0.6); confer with K. Eckstein re same (0.9); confer with S. Birnbaum re same (0.8); confer with team re same (0.6).	4.50	7,650.00
Shore, R.	12/20/21	Confer with team re strategy and next steps in light of District Court ruling.	.60	810.00
Hudson, J.	12/20/21	Confer with S. Gilbert and team re discussions with Debtors and co-counsel re potential next steps following District Court ruling.	.60	435.00
Grim, E.	12/20/21	Confer with team re appeal strategy.	.60	420.00
Wolf, D.	12/20/21	Confer with S. Gilbert, R. Shore, R. Leveridge, E. Grim, J. Hudson, A. Gaske, and S. Sraders re District Court appellate ruling.	.60	420.00
Gaske, A.	12/20/21	Confer with team re case updates and next steps.	.60	345.00
Gaske, A.	12/20/21	Analyze timeline of bankruptcy appeals process.	.70	402.50
Leveridge, R.	12/20/21	Continue review of opinion vacating confirmation (1.3); confer with team re strategy in light of same (0.6).	1.90	2,660.00
Sraders, S.	12/20/21	Confer with team re impact of District Court ruling.	.60	345.00
Gilbert, S.	12/21/21	Confer with A. Preis re plan issues (2.0); confer with financial advisors re plan issues (1.0).	3.00	5,100.00
Gaske, A.	12/21/21	Revise TTP claimant checklist and flow chart mapping TDP.	1.80	1,035.00
Gaske, A.	12/21/21	Revise hospital claimant checklist mapping hospital TDP.	1.00	575.00
Fastenau, L.	12/21/21	Revise flowchart for hospital TDP.	.30	94.50
Gilbert, S.	12/22/21	Confer with Debtors re plan issues.	2.00	3,400.00
Gilbert, S.	12/22/21	Confer with K. Eckstein re plan issues (0.4); confer with D. Molton re same (0.6).	1.00	1,700.00
Gilbert, S.	12/22/21	Confer with group of nine re plan issues (1.0); confer with S. Birnbaum re same (0.4); confer with J. Rice re same (0.6).	2.00	3,400.00
Gaske, A.	12/22/21	Revise additional portions of TPP TDP flowchart.	.70	402.50
Gilbert, S.	12/23/21	Confer with A. Preis re plan issues.	1.50	2,550.00
Gilbert, S.	12/27/21	Meet with financial advisors re plan issues.	1.00	1,700.00
Gilbert, S.	12/29/21	Analyze plan and mediation issues in preparation for hearing.	2.00	3,400.00
Gilbert, S.	12/29/21	Attend hearing re plan.	3.00	5,100.00

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Gilbert, S.	12/29/21	Confer with A. Preis re plan issues (1.5); confer with K. Eckstein re same (1.0); confer with other counsel re same (0.5).	3.00	5,100.00
Gilbert, S.	12/30/21	Confer with Debtors re mediation (1.8); confer with co-counsel re same (1.2); confer with private counsel re same (1.0).	4.00	6,800.00
Gilbert, S.	12/30/21	Confer with Sackler counsel re mediation.	2.00	3,400.00
Gilbert, S.	12/30/21	Analyze mediation issues.	1.00	1,700.00
Gilbert, S.	12/31/21	Confer with A. Preis re mediation and plan issues (0.9); confer with Debtors re same (0.6).	1.50	2,550.00
Gilbert, S.	12/31/21	Attend Chambers conference.	1.00	1,700.00
Gilbert, S.	12/31/21	Analyze strategy re mediation and plan issues.	1.00	1,700.00
Gilbert, S.	12/31/21	Confer with K. Eckstein re mediation.	1.00	1,700.00
Quinn, K.	12/31/21	Communicate with co-counsel re appeal issues.	.20	220.00
Project Total:			79.80	\$ 93,338.50

A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Shore, R.	12/01/21	Review and comment on discovery responses.	1.00	1,350.00
Hudson, J.	12/01/21	Revise potential approach to resolving National Union issue.	.10	72.50
Hudson, J.	12/01/21	Revise amended responses to requests for admissions re notice.	.10	72.50
Rubinstein, J.	12/01/21	Revise request for admissions responses (0.5); revise draft pleading re National Union policy year issue (0.5); correspond with Debtors' counsel re broker production (0.2); analysis re insurer productions (0.4); advance policy stipulation review process re multiple insurer groups (0.5); correspond with Debtors' counsel re Marsh production (0.2); communicate with Debtors' counsel re scheduling insurer meet-and-confer discussion (0.1); review correspondence from Zurich counsel (0.2); review analysis re claim data (0.2); analyze District Court appeal argument (0.5).	3.30	2,640.00
Rush, M.	12/01/21	Analyze Issue #14 strategy.	1.50	1,012.50
Rush, M.	12/01/21	Draft potential motion for summary judgment re Issue #14.	4.70	3,172.50
Bonesteel, A.	12/01/21	Update database and custodian documents to email review database.	1.30	487.50

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Name	Date	Services	Hours	Amount
Gaske, A.	12/01/21	Draft portion of potential motion on Issue #27 re background facts.	3.20	1,840.00
Gaske, A.	12/01/21	Research case law for potential motion re Issue #27.	2.70	1,552.50
Leveridge, R.	12/01/21	Analyze discovery, motions practice, and strategy re insurance adversary proceeding.	1.30	1,820.00
Fastenau, L.	12/01/21	Research drug manufacturers and information.	1.90	598.50
Fastenau, L.	12/01/21	Organize most recent proofs of claim reports for attorney review.	.20	63.00
Fastenau, L.	12/01/21	Draft tracking sheet re comprehensive opioids drug and manufacturer list.	.50	157.50
Carey, C.	12/01/21	Analyze case filings and materials re Issue #32.	2.30	977.50
Sraders, S.	12/01/21	Draft chart analyzing policy language re Issue #27.	2.50	1,437.50
Sraders, S.	12/01/21	Draft letter to Gulf and St. Paul re meet-and-confer.	2.60	1,495.00
Kaminsky, E.	12/01/21	Research rules of civil procedures for responding to National Union motion for more definite statement.	2.30	1,150.00
Turner, C.	12/01/21	Research opioid product / manufacturer.	1.00	195.00
Hubbard, B.	12/01/21	Review opioid research performed by L. Fastenau (1.0); analyze personal injury proofs of claim data to identify claims prescribed non-Purdue opioids (1.5).	2.50	1,062.50
Agwu, I.	12/01/21	Continue research re insurer statements or actions relating to opioid epidemic for upcoming depositions.	3.00	600.00
Shore, R.	12/02/21	Confer with team re open issues.	1.70	2,295.00
Hudson, J.	12/02/21	Confer with team re litigation status and strategy.	1.70	1,232.50
Hudson, J.	12/02/21	Revise notice of dismissal of certain years of National Union policy without prejudice.	1.70	1,232.50
Girgenti, J.	12/02/21	Confer with team re case status and strategy.	1.70	620.50
Rubinstein, J.	12/02/21	Update litigation task list (0.5); analysis re motions practice (0.3); confer with team re strategy (1.7); analysis re National Union policy period issue (0.4); review correspondence from XL and Liberty re meet-and-confer sessions (0.9).	3.80	3,040.00
Rush, M.	12/02/21	Draft potential summary judgment motion re Issue #14.	1.60	1,080.00
Rush, M.	12/02/21	Confer with team re case status and strategy.	1.70	1,147.50
Martinez, S.	12/02/21	Confer with M. Rush, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Girgenti, E. Kaminsky, R. Leveridge, R. Shore, I. Agwu, A. Farra, S. Colcock, S. Sraders, K. Johnson and L. Fastenau re case strategy and updates.	1.70	535.50

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Name	Date	Services	Hours	Amount
Johnson, K.	12/02/21	Confer with M. Rush, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Girgenti, E. Kaminsky, R. Leveridge, R. Shore, I. Agwu, A. Farra, S. Martinez, S. Sraders, S. Colcock and L. Fastenau re case strategy and updates.	1.70	391.00
Johnson, K.	12/02/21	Review and revise document collection and production index re broker production.	.30	69.00
Gaske, A.	12/02/21	Confer with team re strategy and case updates.	1.70	977.50
Gaske, A.	12/02/21	Draft potential motion on Issue #27 re argument section.	4.80	2,760.00
Gaske, A.	12/02/21	Draft portion of potential motion on Issue #27 re standard and contract interpretation rules.	4.70	2,702.50
Leveridge, R.	12/02/21	Confer with team re adversary proceeding status, projects and related matters.	1.70	2,380.00
Leveridge, R.	12/02/21	Communications with Reed Smith re coverage issues.	.40	560.00
Leveridge, R.	12/02/21	Analyze developments in District Court and impact on adversary proceeding.	.60	840.00
Fastenau, L.	12/02/21	Continue research re manufacturers for opioids drugs.	3.10	976.50
Fastenau, L.	12/02/21	Confer with M. Rush, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Girgenti, E. Kaminsky, R. Leveridge, R. Shore, I. Agwu, A. Farra, S. Martinez, S. Sraders, K. Johnson, and S. Colcock re case strategy and updates.	1.70	535.50
Fastenau, L.	12/02/21	Review manufacturers for opioids drugs in proofs of claim.	.70	220.50
Fastenau, L.	12/02/21	Research prior case precedent for drafting partial summary judgment.	.20	63.00
Farra, A.	12/02/21	Confer with team re litigation status update.	1.70	1,147.50
Carey, C.	12/02/21	Confer with team re case status and strategy.	1.70	722.50
Carey, C.	12/02/21	Analyze case materials re Issue #32 review.	3.40	1,445.00
Carey, C.	12/02/21	Draft preliminary summary re Issue #32 materials review.	.90	382.50
Sraders, S.	12/02/21	Confer with team re recent developments and strategy.	1.70	977.50
Sraders, S.	12/02/21	Draft letter to Gulf and St. Paul re meet-and-confer.	1.20	690.00
Sraders, S.	12/02/21	Draft chart analyzing policy language re Issue #27.	1.20	690.00
Colcock, S.	12/02/21	Confer with M. Rush, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Girgenti, E. Kaminsky, R. Leveridge, R. Shore, I. Agwu, A. Farra, S. Martinez, S. Sraders, K. Johnson and L. Fastenau re case strategy and updates.	1.70	561.00

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Name	Date	Services	Hours	Amount
Colcock, S.	12/02/21	Research opioid drug manufacturers.	1.20	396.00
Kaminsky, E.	12/02/21	Confer with team re litigation status and strategy.	1.70	850.00
Kaminsky, E.	12/02/21	Continue researching rules of civil procedure for responding to National Union's motion for more definite statement.	1.40	700.00
Kaminsky, E.	12/02/21	Draft research memorandum re Issue #2.	2.80	1,400.00
Agwu, I.	12/02/21	Meet with team re status of litigation.	1.70	340.00
Agwu, I.	12/02/21	Continue research re insurer statements or conduct relating to knowledge of opioid epidemic for upcoming depositions.	2.80	560.00
Shore, R.	12/03/21	Analyze discovery strategy and pending issues.	1.50	2,025.00
Hudson, J.	12/03/21	Analyze discovery strategy with respect to Issue #2.	.90	652.50
Hudson, J.	12/03/21	Revise supplemental responses to requests for admission.	.40	290.00
Rubinstein, J.	12/03/21	Correspond with UCC counsel re policy stipulation discussions (0.2); meet-and-confer with Gulf/St. Paul counsel re policy stipulation (0.4); analyze various pending issues, including motions practice (0.9); analyze discovery strategy (0.8); review research re Issue #1 (0.6); review briefing re Issue #27 (0.6).	3.50	2,800.00
Rush, M.	12/03/21	Analyze Issue #14.	1.40	945.00
Rush, M.	12/03/21	Draft potential summary judgment motion re Issue #14.	4.80	3,240.00
Martinez, S.	12/03/21	Identify third-party payer underlying complaints in support for drafting motion for partial summary judgment.	.80	252.00
Martinez, S.	12/03/21	Analyze CGL and Bermuda policies re underlying limits policy language.	.10	31.50
Gaske, A.	12/03/21	Meet-and-confer with counsel for Gulf and St. Paul, counsel for UCC, and J. Rubinstein re policy stipulation process.	.40	230.00
Gaske, A.	12/03/21	Revise Gulf and St. Paul policy comparison spreadsheet in preparation for call with Gulf and St. Paul re policy stipulation.	.30	172.50
Gaske, A.	12/03/21	Draft portion of potential motion on Issue #27 re legal argument.	5.60	3,220.00
Leveridge, R.	12/03/21	Analyze discovery responses and issues.	1.40	1,960.00
Carey, C.	12/03/21	Analyze case materials re Issue #32 review.	3.00	1,275.00
Carey, C.	12/03/21	Revise draft research summary re Issue #32 materials review.	1.80	765.00
Sraders, S.	12/03/21	Analyze Issues #1 and #2.	.80	460.00

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Name	Date	Services	Hours	Amount
Colcock, S.	12/03/21	Research cases in response to insurer arguments.	.90	297.00
Colcock, S.	12/03/21	Research federal and state court cases (11 cases) for certain insurers as parties.	5.10	1,683.00
Kaminsky, E.	12/03/21	Research for memorandum re Issue #53.	1.80	900.00
Lloyd, M.	12/03/21	Research insurers as parties to lawsuit.	2.40	468.00
Turner, C.	12/03/21	Research federal and state court cases for certain insurer parties.	3.60	702.00
Agwu, I.	12/03/21	Continue researching insurer statements or actions related to knowledge of opioid epidemic for upcoming depositions.	1.50	300.00
Rush, M.	12/04/21	Draft potential summary judgment motion re Issue #14.	3.40	2,295.00
Gaske, A.	12/04/21	Revise potential motion on Issue #27 re argument section.	4.30	2,472.50
Gaske, A.	12/04/21	Revise draft motion on Issue #27 re factual background.	2.70	1,552.50
Rush, M.	12/05/21	Continue drafting potential summary judgment motion on Issue #14.	3.50	2,362.50
Gaske, A.	12/05/21	Revise potential motion re contract interpretation section and standard of review.	2.90	1,667.50
Gaske, A.	12/05/21	Revise potential motion on Issue #27 re argument section.	3.90	2,242.50
Kaminsky, E.	12/05/21	Continue research re Issue #53.	2.00	1,000.00
Shore, R.	12/06/21	Review consent article (0.3); review draft motion re Issue #27 (1.7).	2.00	2,700.00
Rubinstein, J.	12/06/21	Review National Union production correspondence (0.3); correspond with Gulf/St. Paul counsel re meet-and-confer scheduling (0.1); revise motion re Issue #13 (2.9); revise motion re Issue #27 (2.4).	5.70	4,560.00
Rush, M.	12/06/21	Revise potential summary judgment motion re Issue #14.	.40	270.00
Martinez, S.	12/06/21	Confer with E. Kaminsky re policy review project.	.10	31.50
Martinez, S.	12/06/21	Analyze CGL and Bermuda policies (2.9); draft underlying limits policy language tracking index (0.8).	3.70	1,165.50
Johnson, K.	12/06/21	Review and revise policies spreadsheet.	.60	138.00
Johnson, K.	12/06/21	Organize materials re policy comparison re Insurers #18, #19, and #20.	1.30	299.00
Bonesteel, A.	12/06/21	Update production database.	3.50	1,312.50
Gaske, A.	12/06/21	Review comments from J. Rubinstein re potential motion on Issue #27.	.40	230.00

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Name	Date	Services	Hours	Amount
Gaske, A.	12/06/21	Review plaintiffs' and Liberty's versions of certain policies.	2.10	1,207.50
Leveridge, R.	12/06/21	Review and revise draft brief from M. Rush (1.7); review and revise draft brief from A. Gaske (2.6).	4.30	6,020.00
Leveridge, R.	12/06/21	Review status of research re Issue #58.	.40	560.00
Fastenau, L.	12/06/21	Review policies and note policy language related to exhaustion of underlying limits.	3.40	1,071.00
Carey, C.	12/06/21	Review Issue #32 research.	.30	127.50
Carey, C.	12/06/21	Confer with S. Sraders re Issue #58 research.	.40	170.00
Sraders, S.	12/06/21	Confer with C. Carey re Issue #58.	.40	230.00
Sraders, S.	12/06/21	Draft chart re policy language re Issue #27.	4.10	2,357.50
Colcock, S.	12/06/21	Analyze research re certain insurers as parties to various opioids lawsuits.	3.40	1,122.00
Kaminsky, E.	12/06/21	Confer with S. Martinez re policy review.	.10	50.00
Kaminsky, E.	12/06/21	Continue research re Issue #53.	2.80	1,400.00
Turner, C.	12/06/21	Research federal and state court cases for certain insurer parties.	2.20	429.00
Agwu, I.	12/06/21	Continue researching insurer statements re opioid epidemic in preparation for upcoming depositions.	1.50	300.00
Shore, R.	12/07/21	Confer with S. Higgins re settlement demands (0.6); review brief re Issue #14 and provide comments to same (0.2); confer with J. Rubinstein re draft motions (0.7).	1.50	2,025.00
Hudson, J.	12/07/21	Review policy evidence produced to date.	.10	72.50
Hudson, J.	12/07/21	Confer with Debtors re resolving policy year dispute with National Union.	.20	145.00
Rubinstein, J.	12/07/21	Revise draft motions re Issues #13 and #27 (0.8); confer with R. Shore re same (0.7); confer with R. Leveridge and M. Rush re strategy (0.4); review summary of insurer production documents relevant to Issue #1 (0.7); correspond with Debtors' counsel re National Union policy period issue (0.3); confer with R. Leveridge re Liberty discovery (0.4).	3.30	2,640.00
Wolf, D.	12/07/21	Confer with S. Higgins and R. Shore re insurance adversary proceeding.	.60	420.00
Rush, M.	12/07/21	Confer with R. Leveridge and J. Rubinstein re other opioid insurance issues.	.40	270.00
Rush, M.	12/07/21	Review pleadings in McKesson insurance litigation.	1.10	742.50
Rush, M.	12/07/21	Revise deficiency letter to insurers.	1.40	945.00
Rush, M.	12/07/21	Revise potential summary judgment motion re Issue #14.	.70	472.50

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Name	Date	Services	Hours	Amount
Martinez, S.	12/07/21	Finalize review of Bermuda and CGL policies (1.1); finalize underlying limits policy language tracking index (0.3).	1.40	441.00
Johnson, K.	12/07/21	Revise Bermuda coverage chart.	1.30	299.00
Johnson, K.	12/07/21	Review and organize Insurer #24 production; revise document collection log.	.30	69.00
Johnson, K.	12/07/21	Review status of policy comparison for Insurers #18, #19, and #20.	.30	69.00
Bonesteel, A.	12/07/21	Set up searches for document review.	2.50	937.50
Bonesteel, A.	12/07/21	Update production database.	4.50	1,687.50
Gaske, A.	12/07/21	Review other drafts of potential motion re conformity between motions.	.40	230.00
Gaske, A.	12/07/21	Review case law re concurrent cause theory of liability for potential motion on Issue #27.	2.10	1,207.50
Leveridge, R.	12/07/21	Communication with Reed Smith re other opioid coverage actions.	1.20	1,680.00
Leveridge, R.	12/07/21	Review communication from opposing counsel re discovery.	.60	840.00
Leveridge, R.	12/07/21	Revise potential brief re Issue #14 (0.6); revise brief re issue #27 (1.2).	1.80	2,520.00
Ogrey, S.	12/07/21	Revise Bermuda coverage chart for those policies currently in arbitration.	.90	207.00
Fastenau, L.	12/07/21	Review policies and note policy language related to exhaustion of underlying limits	4.50	1,417.50
Carey, C.	12/07/21	Draft charts re Issue #32 research analysis.	1.00	425.00
Carey, C.	12/07/21	Review Issue #32 research materials.	1.40	595.00
Sraders, S.	12/07/21	Review status of National Union production.	.10	57.50
Sraders, S.	12/07/21	Review revised Bermuda form coverage chart.	1.10	632.50
Sraders, S.	12/07/21	Revise draft letter to Gulf and St. Paul to incorporate comments from M. Rush.	1.60	920.00
Sraders, S.	12/07/21	Draft letter to Liberty re November 18 meet-and-confer and December 2 letter.	1.00	575.00
Lloyd, M.	12/07/21	Review and quality check certain insurer policies comparison materials.	1.10	214.50
Shore, R.	12/08/21	Confer with team re Issues #14 and #27 briefs (3.4); review same (0.4); confer with A. Troop, D. Wolf and J. Hudson re adversary proceeding (1.0).	4.80	6,480.00
Hudson, J.	12/08/21	Review summary of treatment of personal injury claims.	.10	72.50
Hudson, J.	12/08/21	Analyze document review and production process.	1.10	797.50
Hudson, J.	12/08/21	Communicate with counsel for personal injury claimants re litigation status.	.20	145.00

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Name	Date	Services	Hours	Amount
Hudson, J.	12/08/21	Communicate with counsel for formerly non-consenting state group re settlement and litigation status.	1.00	725.00
Hudson, J.	12/08/21	Review motions strategy.	.10	72.50
Hudson, J.	12/08/21	Confer with Debtors' risk manager re details of historic insurance placement.	.20	145.00
Hudson, J.	12/08/21	Revise notice to resolve policy period dispute with National Union.	.10	72.50
Girgenti, J.	12/08/21	Research cite for briefing re Issue #14.	1.90	693.50
Rubinstein, J.	12/08/21	Confer with team re motion practice re Issues #13 and #27 (3.4); review pleadings from other opioid coverage cases relevant to issues in adversary proceeding (0.8); review Debtors' production letter (0.1); analyze Marsh production documents re offensive discovery (0.6); confer with Debtors, A. Kramer, and J. Hudson re National Union policy year issue (0.2); communicate with R. Leveridge re same (0.1); review I. Agwu factual research re insurer defendants (0.5).	5.70	4,560.00
Wolf, D.	12/08/21	Confer with A. Troop, R. Shore, and J. Hudson re insurance adversary proceeding.	1.00	700.00
Rush, M.	12/08/21	Revise potential summary judgment motion re Issue #14.	1.80	1,215.00
Rush, M.	12/08/21	Confer with team re potential summary judgment motions.	3.40	2,295.00
Rush, M.	12/08/21	Confer with S. Sraders re insurer deficiency letters.	.40	270.00
Johnson, K.	12/08/21	Review adversary proceeding protective order.	.10	23.00
Bonesteel, A.	12/08/21	Review and set up searches for document review.	2.50	937.50
Gaske, A.	12/08/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, and M. Rush re strategy and revisions to potential motions on Issues #14 and #27.	3.40	1,955.00
Gaske, A.	12/08/21	Research re contract interpretation principles in certain jurisdictions for potential motion re Issue #27.	2.40	1,380.00
Leveridge, R.	12/08/21	Confer with team re motion practice and discovery issues (3.4); analyze same (0.4).	3.80	5,320.00
Fastenau, L.	12/08/21	Confer with B. Hubbard re drug manufacturer research.	.40	126.00
Fastenau, L.	12/08/21	Research mediator reports filed with the Court.	.50	157.50
Carey, C.	12/08/21	Revise Issue #32 research charts.	1.90	807.50
Carey, C.	12/08/21	Confer with S. Sraders re Issue #32 research charts.	.80	340.00
Carey, C.	12/08/21	Review Issue #32 research materials.	2.90	1,232.50

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Name	Date	Services	Hours	Amount
Sraders, S.	12/08/21	Confer with M. Rush re letter to Liberty re discovery responses.	.40	230.00
Sraders, S.	12/08/21	Review hot documents identified by reviewers.	.50	287.50
Sraders, S.	12/08/21	Confer with C. Carey re review of reports re Issue #58.	.80	460.00
Sraders, S.	12/08/21	Draft letter to National Union re November 22 meet-and-confer re discovery.	.40	230.00
Sraders, S.	12/08/21	Draft letter to Liberty re meet-and-confer re discovery.	2.70	1,552.50
Kaminsky, E.	12/08/21	Draft protocol for privilege review in response to request for production from insurers.	2.50	1,250.00
Hubbard, B.	12/08/21	Confer with L. Fastenau re opioid product and manufacturer research.	.40	170.00
Agwu, I.	12/08/21	Continue researching insurer public statements re opioid epidemic in preparation for upcoming depositions.	2.00	400.00
Shore, R.	12/09/21	Review status of summary judgment motions (0.2); review cases re Issue #14 (0.8); confer with team re pending litigation issues (1.4); review background materials (0.4); review and analysis re summary judgment briefs (0.8); review P. Breene email inquiry re Issue #20 (0.1); communicate with A. Gaske re Partridge (0.2); review and provide comments to deficiency letter re Gulf and St. Paul discovery responses (1.1).	5.00	6,750.00
Hudson, J.	12/09/21	Finalize notice resolving policy period dispute with National Union.	.20	145.00
Hudson, J.	12/09/21	Analyze options for coverage chart focusing on policies at issue.	.70	507.50
Hudson, J.	12/09/21	Confer with team re litigation status and strategy.	1.40	1,015.00
Hudson, J.	12/09/21	Summarize items for document review.	.60	435.00
Girgenti, J.	12/09/21	Review and tag documents for privilege that are responsive to defendants' request for production of documents.	3.30	1,204.50
Girgenti, J.	12/09/21	Confer with team re adversary proceeding and case update.	1.40	511.00
Girgenti, J.	12/09/21	Research re Issue #27 for potential summary judgment motion.	2.70	985.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	12/09/21	Review correspondence from Liberty re Committee productions (0.2); update litigation task list (0.7); analysis re Navigators confidentiality inquiry as relates to Navigators forthcoming production (0.4); participate in meet-and-confer call with Gulf/St. Paul counsel and A. Crawford (0.5); analysis re discovery strategy (0.4); confer with A. Crawford and R. Leveridge re same (0.9); confer with team re litigation strategy (1.4); review National Union production correspondence (0.1); analysis re motions practice (0.6); revise discovery letters re insurer productions (1.1); revise correspondence re Committee productions (0.3).	6.60	5,280.00
Rush, M.	12/09/21	Revise summary judgment motion re Issue #14.	4.20	2,835.00
Rush, M.	12/09/21	Confer with team re case status and strategy.	1.40	945.00
Rush, M.	12/09/21	Review protective order.	.80	540.00
Rush, M.	12/09/21	Review revisions to deficiency letters to insurers.	.50	337.50
Martinez, S.	12/09/21	Confer with M. Rush, J. Hudson, R. Leveridge, R. Shore, J. Rubinstein, I. Agwu, J. Girgenti, A. Farra, S. Sraders, E. Kaminsky, A. Gaske, C. Carey, B. Hubbard, S. Ogrey, S. Colcock, L. Fastenau, and K. Johnson re status and strategy.	1.40	441.00
Martinez, S.	12/09/21	Confer with B. Hubbard and L. Fastenau re MDL-named opioid drug manufacturers tracking project.	.50	157.50
Martinez, S.	12/09/21	Confer with L. Fastenau re MDL-named opioid drug manufacturers research project.	.40	126.00
Martinez, S.	12/09/21	Review Rite Aid v. Ace American Insurance Company docket in support of drafting summary judgment motion.	.20	63.00
Johnson, K.	12/09/21	Revise and file notice to dismiss National Union policies.	1.50	345.00
Johnson, K.	12/09/21	Revise Bermuda policy chart re dismissed National Union policies.	.30	69.00
Johnson, K.	12/09/21	Confer with S. Sraders, A. Farra, B. Hubbard and S. Ogrey re policy chart revisions.	.50	115.00
Johnson, K.	12/09/21	Confer with M. Rush, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Girgenti, E. Kaminsky, R. Leveridge, R. Shore, I. Agwu, A. Farra, S. Martinez, S. Sraders, S. Colcock, L. Fastenau, and S. Ogrey re case strategy and updates.	1.40	322.00
Johnson, K.	12/09/21	Review and organize Insurer #24 production; revise production index and document collection spreadsheet.	.30	69.00

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Name	Date	Services	Hours	Amount
Gaske, A.	12/09/21	Confer with B. Hubbard re analysis of personal injury proofs of claim for potential motion on Issue #27.	.60	345.00
Gaske, A.	12/09/21	Draft overview of case law in certain jurisdictions re interpreting ambiguities in contracts.	.70	402.50
Gaske, A.	12/09/21	Review certain proofs of claim re potential motion on Issue #27.	1.20	690.00
Gaske, A.	12/09/21	Review history of certain policy provision for potential motion on Issue #27.	.40	230.00
Gaske, A.	12/09/21	Confer with team re litigation strategy and case updates.	1.40	805.00
Gaske, A.	12/09/21	Draft overview of concurrent cause cases and related insurance provisions re potential motion on Issue #27.	2.50	1,437.50
Leveridge, R.	12/09/21	Confer with team re litigation strategy.	1.40	1,960.00
Leveridge, R.	12/09/21	Analyze issues for meeting with Debtors' counsel re litigation strategy (0.8); confer with A. Crawford re same (0.9).	1.70	2,380.00
Ogrey, S.	12/09/21	Confer with A. Farra, B. Hubbard, and K. Johnson re Bermuda, CGL, and Rhodes coverage charts.	.50	115.00
Ogrey, S.	12/09/21	Confer with M. Rush, J. Hudson, R. Leveridge, R. Shore, J. Rubinstein, I. Agwu, J. Girgenti, A. Farra, S. Sraders, E. Kaminsky, A. Gaske, C. Carey, B. Hubbard, S. Ogrey, S. Colcock, L. Fastenau, and K. Johnson.	1.40	322.00
Ogrey, S.	12/09/21	Revise coverage charts for Bermuda, Rhodes, and CGL.	1.30	299.00
Fastenau, L.	12/09/21	Confer with M. Rush, J. Hudson, R. Leveridge, R. Shore, J. Rubinstein, I. Agwu, J. Girgenti, A. Farra, S. Sraders, E. Kaminsky, A. Gaske, C. Carey, B. Hubbard, S. Ogrey, S. Colcock, S. Martinez, and K. Johnson re case strategy and updates.	1.40	441.00
Fastenau, L.	12/09/21	Organize most recent proofs of claim reports for attorney review.	.20	63.00
Fastenau, L.	12/09/21	Confer with B. Hubbard and S. Martinez re opioid drug manufacturer in named MDL cases.	.50	157.50
Fastenau, L.	12/09/21	Confer with S. Martinez re opioid drug manufacturer in named MDL cases research project.	.40	126.00
Farra, A.	12/09/21	Revise draft coverage charts.	.20	135.00
Farra, A.	12/09/21	Confer with team re status and strategy litigation update.	1.40	945.00
Farra, A.	12/09/21	Confer with S. Ogrey, S. Sraders, K. Johnson, and B. Hubbard re draft coverage charts.	.50	337.50

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Name	Date	Services	Hours	Amount
Carey, C.	12/09/21	Review Issue #32 research materials.	3.50	1,487.50
Carey, C.	12/09/21	Confer with team re case status and strategy.	1.40	595.00
Carey, C.	12/09/21	Revise Issue #32 research charts.	1.90	807.50
Sraders, S.	12/09/21	Confer with A. Farra, B. Hubbard, K. Johnson, and S. Ogrey re coverage charts.	.50	287.50
Sraders, S.	12/09/21	Confer with team re ongoing matters and next steps.	1.40	805.00
Sraders, S.	12/09/21	Analyze revised coverage charts.	.30	172.50
Sraders, S.	12/09/21	Revise draft letter to Gulf and St. Paul to incorporate comments from R. Shore and J. Rubinstein.	.70	402.50
Sraders, S.	12/09/21	Draft letter to National Union re meet-and-confer.	1.00	575.00
Sraders, S.	12/09/21	Review summary of reports re Issue #58.	.10	57.50
Colcock, S.	12/09/21	Confer with M. Rush, J. Hudson, R. Leveridge, R. Shore, J. Rubinstein, I. Agwu, J. Girgenti, A. Farra, S. Sraders, E. Kaminsky, A. Gaske, C. Carey, B. Hubbard, S. Ogrey, S. Martinez, L. Fastenau, and K. Johnson re case status and updates.	1.40	462.00
Kaminsky, E.	12/09/21	Confer with team re litigation status and strategy.	1.40	700.00
Kaminsky, E.	12/09/21	Begin review of documents for privilege in response to request for production from insurers.	4.30	2,150.00
Hubbard, B.	12/09/21	Analyze sample proof of claim form to attach to brief re Issue #27.	2.20	935.00
Hubbard, B.	12/09/21	Confer with A. Gaske re sample proof of claim form.	.60	255.00
Hubbard, B.	12/09/21	Review general opioid forms for claims per Issue #27 (0.5); analyze opioid manufacturer listing and proofs of claim form next steps (1.3).	1.80	765.00
Hubbard, B.	12/09/21	Confer with A. Farra, S. Sraders, K. Johnson, and S. Ogrey re coverage chart.	.50	212.50
Hubbard, B.	12/09/21	Meet with M. Rush, I. Agwu, J. Girgenti, A. Farra, S. Sraders, K. Johnson, E. Kaminsky, J. Hudson, L. Fastenau, S. Martinez, R. Leveridge, A. Gaske, S. Colcock, J. Rubinstein, S. Ogrey, C. Carey, R. Shore re status and strategy.	1.40	595.00
Hubbard, B.	12/09/21	Confer with L. Fastenau and S. Martinez re opioid and manufacturer product list.	.50	212.50
Agwu, I.	12/09/21	Meet with team re litigation status and strategy.	1.40	280.00
Agwu, I.	12/09/21	Continue researching insurer statements re opioid epidemic in preparation for upcoming depositions.	1.10	220.00
Hudson, J.	12/10/21	Finalize and send response to Liberty request re timing of Committees' document productions.	.40	290.00

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Name	Date	Services	Hours	Amount
Hudson, J.	12/10/21	Finalize amended responses to notice-related requests for admission.	1.30	942.50
Hudson, J.	12/10/21	Analyze next steps for document production.	.20	145.00
Hudson, J.	12/10/21	Confer with Debtors re litigation strategy.	.80	580.00
Girgenti, J.	12/10/21	Review and tag documents responsive to defendants' request for production of document for privilege.	2.90	1,058.50
Girgenti, J.	12/10/21	Continue research re Issue #27 for potential summary judgment motion.	2.40	876.00
Girgenti, J.	12/10/21	Draft section of potential summary judgment motion re Issue #27.	2.90	1,058.50
Rubinstein, J.	12/10/21	Communications with UCC and Debtors' counsel re discovery productions (0.3); review R. Shore proposed edits to discovery deficiency letters to insurers (0.5); review research re motions practice re Issues #13 and #27 (1.1); correspond with UCC re case productions (0.2); communication with J. Hudson re finalizing request for admissions amendments (0.2); review Navigators discovery correspondence re meet-and-confer (0.7); confer with co-plaintiffs' counsel re collection of open items (0.8).	3.80	3,040.00
Rush, M.	12/10/21	Revise summary judgment brief re Issue #14.	5.60	3,780.00
Rush, M.	12/10/21	Confer with Debtors' counsel re case strategy.	.80	540.00
Johnson, K.	12/10/21	Draft insurer and Debtors' productions listing.	.80	184.00
Bonesteel, A.	12/10/21	Communicate with team re outgoing and incoming productions.	.90	337.50
Gaske, A.	12/10/21	Draft overview of research question for C. Carey re potential motion on Issue #27.	.50	287.50
Gaske, A.	12/10/21	Confer with C. Carey re Issue #45.	.20	115.00
Leveridge, R.	12/10/21	Confer with Debtors' counsel re various litigation issues.	.80	1,120.00
Leveridge, R.	12/10/21	Review revised draft of motion.	.70	980.00
Leveridge, R.	12/10/21	Communications with co-counsel and opposing counsel re defensive and offensive discovery.	1.10	1,540.00
Farra, A.	12/10/21	Confer with P. Breene, A. Kramer, R. Leveridge, J. Rubinstein, J. Hudson, and M. Rush re adversary litigation status update.	.80	540.00
Farra, A.	12/10/21	Analyze litigation status / strategy.	.80	540.00
Carey, C.	12/10/21	Confer with A. Gaske re Issue #32 and next steps.	.20	85.00
Carey, C.	12/10/21	Review Issue #32 research materials.	4.60	1,955.00
Carey, C.	12/10/21	Revise Issue #32 research charts.	1.90	807.50

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Name	Date	Services	Hours	Amount
Sraders, S.	12/10/21	Draft follow-up letter from meet-and-confer to National Union.	.60	345.00
Sraders, S.	12/10/21	Revise draft letter to Gulf and St. Paul to incorporate comments from J. Rubinstein and R. Shore.	1.10	632.50
Kaminsky, E.	12/10/21	Analyze status of defensive discovery.	.90	450.00
Kaminsky, E.	12/10/21	Continue reviewing documents for privilege in response to request for production by insurers.	2.10	1,050.00
Kaminsky, E.	12/10/21	Revise Issue #2 memorandum.	.90	450.00
Rush, M.	12/11/21	Revise summary judgment brief re Issue #14.	1.20	810.00
Gaske, A.	12/11/21	Review suggested revisions to potential motion on Issue #27.	.50	287.50
Leveridge, R.	12/11/21	Review and revise draft of motion from M. Rush.	2.30	3,220.00
Shore, R.	12/12/21	Analyze brief re Issue #14 (2.5); revise same (3.5).	6.00	8,100.00
Hudson, J.	12/12/21	Review status of analysis of proofs of claim.	.20	145.00
Gaske, A.	12/12/21	Revise factual background section of potential motion re Issue #27.	4.10	2,357.50
Leveridge, R.	12/12/21	Review status of draft motion.	.40	560.00
Carey, C.	12/12/21	Preliminary research re Issue #32 case precedent.	3.20	1,360.00
Carey, C.	12/12/21	Draft summary re Issue #32 case precedent research.	1.90	807.50
Carey, C.	12/12/21	Analyze draft motion materials re Issue #32 research.	2.50	1,062.50
Sraders, S.	12/12/21	Draft letters to National Union and Liberty re follow up from meet-and-confers.	1.40	805.00
Kaminsky, E.	12/12/21	Continue revising memorandum re Issue #2.	1.20	600.00
Shore, R.	12/13/21	Review and revise potential motion re Issue #14 (4.0); analyze issues re same (1.5); confer with R. Leveridge and J. Rubinstein re TIG strategy (0.5).	6.00	8,100.00
Hudson, J.	12/13/21	Communicate with review team re status of AHC document review.	.10	72.50
Hudson, J.	12/13/21	Outline points for inclusion in potential motion re Issue #14.	.20	145.00
Hudson, J.	12/13/21	Review scope of UCC production of broker-related materials.	.20	145.00
Girgenti, J.	12/13/21	Review and tag documents for privilege that are responsive to defendants' request for production of documents (2.9); review and analyze documents to be produced by UCC (1.4); review and issue tag Navigators supplemental document production for relevance and responsive documents (0.6).	4.90	1,788.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	12/13/21	Review and revise brief re Issue #13 (2.3); confer with R. Leveridge re strategy and open tasks (0.3); review correspondence from TIG counsel re arbitration and communications with Debtors' counsel re same (0.2); confer with R. Leveridge and R. Shore re same (0.5); revise correspondence re proofs of claim materials (0.2); confer with team re strategy (0.4); review Navigators correspondence (0.3); review amended request for admissions responses (0.2); analysis re proposed UCC production (0.4); review revised deficiency letter (0.1).	4.70	3,760.00
Rush, M.	12/13/21	Revise potential summary judgment motion re Issue #14 and supporting materials.	1.80	1,215.00
Martinez, S.	12/13/21	Review and revise citations to memorandum re choice-of-law and notice requirements.	.50	157.50
Martinez, S.	12/13/21	Review MDL complaints re opioid product listing tracking project.	2.00	630.00
Johnson, K.	12/13/21	Review and organize supplemental Navigators production; revise document collection and production Index.	.30	69.00
Johnson, K.	12/13/21	Review docket re Ironshore order.	.30	69.00
Johnson, K.	12/13/21	Confer with B. Hubbard re policy chart revisions (0.6); revise data to combine all adversary proceeding policies (1.4).	2.00	460.00
Gaske, A.	12/13/21	Revise potential motion on Issue #27 re policy language and insurer position sections.	2.40	1,380.00
Gaske, A.	12/13/21	Revise potential motion on Issue #27 re lack of certain relevant provision in policies.	3.40	1,955.00
Gaske, A.	12/13/21	Revise potential motion on Issue #27 re portion of motion discussing Issue #45.	4.80	2,760.00
Gaske, A.	12/13/21	Research Issue #45 for inclusion in potential motion on Issue #27.	4.60	2,645.00
Leveridge, R.	12/13/21	Confer with J. Rubinstein re strategy and status (0.3); confer with R. Shore and J. Rubinstein re TIG (0.5); analyze status of research, motions being drafting, and fact development discovery (2.4); communicate with Debtors re same (0.5); communicate with co-counsel and Prime Clerk re proofs of claim data (0.6).	4.30	6,020.00
Ogrey, S.	12/13/21	Draft coverage chart combining CGL, Bermuda, and Rhodes policies.	.90	207.00
Fastenau, L.	12/13/21	Confer with B. Hubbard re opioid drug manufacturer in named MDL cases.	.50	157.50

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Name	Date	Services	Hours	Amount
Fastenau, L.	12/13/21	Research named opioid drug manufacturer in MDL cases.	2.60	819.00
Fastenau, L.	12/13/21	Research opioid drug manufacturers corporate history in relation to opioid production.	1.70	535.50
Carey, C.	12/13/21	Research case precedent re Issue #32.	3.50	1,487.50
Carey, C.	12/13/21	Review Issue #32 research charts.	1.80	765.00
Carey, C.	12/13/21	Revise summary re Issue #32 research case precedent.	1.80	765.00
Sraders, S.	12/13/21	Draft letters to National Union and Liberty re meet-and-confers.	1.80	1,035.00
Sraders, S.	12/13/21	Review chart re analysis of reports re Issue #58.	.90	517.50
Sraders, S.	12/13/21	Review analysis of policy language re Issue #27.	.50	287.50
Kaminsky, E.	12/13/21	Revise memorandum re Issue #53.	.90	450.00
Kaminsky, E.	12/13/21	Continue reviewing documents re privilege for production to insurers.	5.50	2,750.00
Hubbard, B.	12/13/21	Communicate with Prime Clerk re access to proof of claim documents for personal injury claims (0.6); review opioid manufacturing research (0.3); review third-party payor proof of claim forms for sample (1.2).	2.10	892.50
Hubbard, B.	12/13/21	Confer with K. Johnson re coverage chart.	.60	255.00
Hubbard, B.	12/13/21	Communicate with L. Fastenau re MDL defendant opioid research.	.50	212.50
Hubbard, B.	12/13/21	Create sample coverage charts.	2.30	977.50
Shore, R.	12/14/21	Review summary judgment briefs (0.9); confer with team re same (2.4).	3.30	4,455.00
Hudson, J.	12/14/21	Outline research tasks.	.10	72.50
Hudson, J.	12/14/21	Communicate with co-counsel (UCC) re document productions made by insurers to date.	.20	145.00
Hudson, J.	12/14/21	Review search terms pertinent to AHC document collection.	.10	72.50
Girgenti, J.	12/14/21	Review and tag documents for privilege that responsive to defendants' request for production of documents.	3.30	1,204.50
Rubinstein, J.	12/14/21	Confer with M. Rush, R. Shore, and R. Leveridge re revision to motion re Issue #13 (2.4); correspond with B. Hubbard re claim data (0.2); review response to TIG re arbitration (0.1); revise motion re Issue #27 (4.4).	7.10	5,680.00
Wolf, D.	12/14/21	Review summary judgment motion re Issue #16.	1.90	1,330.00
Rush, M.	12/14/21	Review discovery issues.	.20	135.00

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Name	Date	Services	Hours	Amount
Rush, M.	12/14/21	Confer with team re potential summary judgment motion re Issue #14.	2.40	1,620.00
Rush, M.	12/14/21	Revise potential summary judgment brief re Issue #14.	5.40	3,645.00
Martinez, S.	12/14/21	Finalize review of MDL complaints re opioid product listing tracking project.	.70	220.50
Johnson, K.	12/14/21	Confer with B. Hubbard and S. Ogrey re policy chart revisions.	.60	138.00
Bonesteel, A.	12/14/21	Communicate with UCC counsel (Akin Gump) re insurer productions.	.70	262.50
Gaske, A.	12/14/21	Review comments from J. Rubinstein on draft potential motion on Issue #27.	.30	172.50
Gaske, A.	12/14/21	Review certain policy language re potential motion on Issue #27.	.40	230.00
Gaske, A.	12/14/21	Review certain proofs of claim re exhibits to potential motion on Issue #27.	1.20	690.00
Leveridge, R.	12/14/21	Review drafts of legal briefs re coverage issues (3.3); confer with team re same (2.4).	5.70	7,980.00
Leveridge, R.	12/14/21	Communicate with co-counsel re TIG issues.	.60	840.00
Leveridge, R.	12/14/21	Review communications with Prime Clerk re proofs of claim (0.2); review select proofs of claim (0.7).	.90	1,260.00
Ogrey, S.	12/14/21	Review drafts of coverage charts re CGL, Bermuda, and Rhodes policies sent from B. Hubbard.	.60	138.00
Ogrey, S.	12/14/21	Confer with B. Hubbard and K. Johnson re Bermuda, CGL, and Rhodes coverage chart.	.60	138.00
Fastenau, L.	12/14/21	Research opioid drug manufacturers corporate history in relation to opioid production.	5.80	1,827.00
Carey, C.	12/14/21	Review materials re Issue #32 research.	4.30	1,827.50
Carey, C.	12/14/21	Revise Issue #32 research charts.	1.70	722.50
Sraders, S.	12/14/21	Revise charts re Issue #58.	2.20	1,265.00
Kaminsky, E.	12/14/21	Continue reviewing documents for privilege for production to insurers.	5.80	2,900.00
Hubbard, B.	12/14/21	Review personal injury claim data images (0.3); review sample claim images provided by Prime Clerk (2.2); create coverage chart template for requested combined Debtors' insurance chart (2.3); review opioid manufacturer research (0.8).	5.60	2,380.00
Hubbard, B.	12/14/21	Confer with S. Ogrey and K. Johnson re coverage charts.	.60	255.00
Agwu, I.	12/14/21	Continue research re insurer knowledge of opioid epidemic for upcoming depositions.	3.50	700.00

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Name	Date	Services	Hours	Amount
Shore, R.	12/15/21	Review and revise Issue #27 brief (5.3); communicate with J. Rubinstein re same and Issue #14 brief (0.7).	6.00	8,100.00
Hudson, J.	12/15/21	Review status of document productions.	.40	290.00
Hudson, J.	12/15/21	Review recent argument raised by Navigators.	.10	72.50
Hudson, J.	12/15/21	Review options for graphically depicting coverage for Court.	.10	72.50
Hudson, J.	12/15/21	Confer with AHC co-counsel re search terms for document review in response to insurer requests.	.10	72.50
Hudson, J.	12/15/21	Confer with AHC co-counsel (Otterburg) re searches in response to insurer document requests.	.10	72.50
Girgenti, J.	12/15/21	Continue reviewing and tagging documents responsive to defendants' request for production for privilege.	3.50	1,277.50
Rubinstein, J.	12/15/21	Review R. Shore proposed edits to brief re Issue #27 (0.7); analysis re Issue #27 (0.3); review Navigators amended answer / affirmative defenses and documents relevant to same (0.5); revise second set of discovery requests to insurer defendants (0.3); confer with R. Leveridge, S. Straders, M. Rush, and C. Carey re Issue #58 (0.7); review materials relevant to Issue #58 discussion (0.3).	2.80	2,240.00
Wolf, D.	12/15/21	Review summary judgment motion re Issue #20.	1.40	980.00
Rush, M.	12/15/21	Revise potential summary judgment brief re Issue #14.	2.60	1,755.00
Rush, M.	12/15/21	Research re potential summary judgment brief re Issue #14.	.40	270.00
Rush, M.	12/15/21	Revise discovery requests to insurers.	.40	270.00
Rush, M.	12/15/21	Confer with team re Issue #58.	.70	472.50
Johnson, K.	12/15/21	Review status of policy chart revisions.	.20	46.00
Bonesteel, A.	12/15/21	Communicate with review team re search parameters for document review.	.70	262.50
Bonesteel, A.	12/15/21	Review all insurer productions to be sent to UCC counsel.	.80	300.00
Gaske, A.	12/15/21	Research certain coverage theory re potential motion on Issue #27.	1.50	862.50
Gaske, A.	12/15/21	Review and revise motion re Issue #27, including incorporating R. Shore comments.	3.00	1,725.00
Leveridge, R.	12/15/21	Review communication from Navigators re motion for leave to amend (0.4); review proposed amendments (1.2); review additional material re same (0.2).	1.80	2,520.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	12/15/21	Review communications from insurers re discovery.	.40	560.00
Leveridge, R.	12/15/21	Analyze Issue #58 issues (0.5); confer with team re same (0.7).	1.20	1,680.00
Ogrey, S.	12/15/21	Begin revising drafts of Bermuda, CGL, and Rhodes coverage chart.	.90	207.00
Carey, C.	12/15/21	Review materials re Issue #32 research.	4.00	1,700.00
Carey, C.	12/15/21	Confer with R. Leveridge, J. Rubinstein, and M. Rush re Issue #58.	.70	297.50
Carey, C.	12/15/21	Revise charts re Issue #32 research.	1.80	765.00
Carey, C.	12/15/21	Analyze Issue #32 research and next steps.	.50	212.50
Sraders, S.	12/15/21	Meet with R. Leveridge, J. Rubinstein, M. Rush, and C. Carey re Issue #58.	.60	345.00
Sraders, S.	12/15/21	Review charts re Issue #58 in preparation for upcoming meeting.	.40	230.00
Sraders, S.	12/15/21	Draft second set of requests for production.	1.60	920.00
Kaminsky, E.	12/15/21	Review documents for privilege re request for production from insurers.	5.50	2,750.00
Agwu, I.	12/15/21	Continue researching insurer knowledge re opioid epidemic prior to litigation for upcoming depositions.	2.00	400.00
Shore, R.	12/16/21	Review motion for partial summary judgment briefs (0.7); confer with J. Rubinstein and A. Gaske re Issue #27 brief (0.7); review Issue #20 brief (1.2); confer with team re litigation status / strategy (0.9).	3.50	4,725.00
Hudson, J.	12/16/21	Confer with co-plaintiffs' counsel (UCC) re production of broker communications.	.10	72.50
Hudson, J.	12/16/21	Confer with AHC co-counsel re search terms for document review in response to insurer requests.	.10	72.50
Girgenti, J.	12/16/21	Review and tag documents for privilege that are responsive to defendants' request for production.	3.20	1,168.00
Girgenti, J.	12/16/21	Confer with team re case status and strategy.	.90	328.50
Rubinstein, J.	12/16/21	Confer with A. Gaske and R. Shore re edits to pleadings re Issue #27 (0.7); analysis re legal research memoranda (0.4); confer with team re case status and strategy (0.9); review Navigators documents re Navigators intent to amend pleadings (0.4); review Debtors' production correspondence (0.1); revise brief re Issue #20 (0.9); revise discovery letters to National Union, Gulf, St. Paul, and Liberty (1.3); review District Court decision re confirmation order (1.1).	5.80	4,640.00
Rush, M.	12/16/21	Review meet-and-confer letters.	1.90	1,282.50
Rush, M.	12/16/21	Confer with team case status and strategy.	.90	607.50

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Name	Date	Services	Hours	Amount
Martinez, S.	12/16/21	Confer with M. Rush, J. Rubinstein, A. Farra, R. Shore, C. Carey, J. Girgenti, E. Kaminsky, I. Agwu, B. Hubbard, A. Bonesteel, S. Sraders, L. Fastenau, A. Gaske, S. Ogrey, and K. Johnson re status and strategy. re case strategy and updates.	.90	283.50
Johnson, K.	12/16/21	Confer with M. Rush, J. Rubinstein, A. Farra, R. Shore, C. Carey, J. Girgenti, E. Kaminsky, I. Agwu, A. Gaske, B. Hubbard, A. Bonesteel, S. Sraders, S. Ogrey, S. Martinez, and L. Fastenau re status and strategy.	.90	207.00
Johnson, K.	12/16/21	Revise policy chart and create legend.	3.70	851.00
Bonesteel, A.	12/16/21	Communicate with T. Tran (Cobra Legal Solutions) re on-going document review.	.30	112.50
Bonesteel, A.	12/16/21	Review Debtors' 10th document production.	.60	225.00
Gaske, A.	12/16/21	Confer with R. Shore and J. Rubinstein re changes to potential motion on Issue #27.	.70	402.50
Gaske, A.	12/16/21	Confer with team re strategy and case updates.	.90	517.50
Gaske, A.	12/16/21	Research coverage theories re potential motion on Issue #27.	2.60	1,495.00
Gaske, A.	12/16/21	Revise potential motion on Issue #27 pursuant to R. Shore and J. Rubinstein comments.	5.40	3,105.00
Gaske, A.	12/16/21	Review draft of potential motion on Issue #20.	.40	230.00
Ogrey, S.	12/16/21	Confer with M. Rush, J. Rubinstein, A. Farra, R. Shore, C. Carey, J. Girgenti, E. Kaminsky, A. Gaske, S. Martinez, I. Agwu, B. Hubbard, A. Bonesteel, S. Sraders, S. Ogrey, and L. Fastenau re status and strategy.	.90	207.00
Ogrey, S.	12/16/21	Revise Bermuda, CGL, and Rhodes coverage chart.	2.00	460.00
Fastenau, L.	12/16/21	Organize most recent proofs of claim reports for attorney review.	.10	31.50
Fastenau, L.	12/16/21	Research opioid drug manufacturers and products they produce.	5.40	1,701.00
Fastenau, L.	12/16/21	Confer with M. Rush, J. Rubinstein, A. Farra, R. Shore, C. Carey, J. Girgenti, E. Kaminsky, I. Agwu, B. Hubbard, A. Bonesteel, S. Sraders, A. Gaske, S. Ogrey, S. Martinez, and K. Johnson re status and strategy.	.90	283.50
Farra, A.	12/16/21	Confer with I. Agwu re research issue.	.40	270.00
Farra, A.	12/16/21	Confer with team re litigation status update.	.90	607.50
Carey, C.	12/16/21	Confer with team re case status and strategy.	.90	382.50
Carey, C.	12/16/21	Research Issue #32 background materials.	3.10	1,317.50
Sraders, S.	12/16/21	Confer with team re litigation status and next steps.	.90	517.50

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Sraders, S.	12/16/21	Review edits to insurer meet-and-confer letters.	.30	172.50
Sraders, S.	12/16/21	Communicate with C. Carey re additional research re Issue #58.	.20	115.00
Kaminsky, E.	12/16/21	Confer with team re litigation strategy and status update.	.90	450.00
Kaminsky, E.	12/16/21	Continue review of documents for privilege for production to insurers.	2.80	1,400.00
Hubbard, B.	12/16/21	Confer with M. Rush, J. Rubinstein, L. Fastenau, I. Agwu, C. Carey, J. Girgenti, E. Kaminsky, A. Bonesteel, A. Farra, A. Gaske, S. Ogrey, K. Johnson, S. Sraders re status and strategy.	.90	382.50
Agwu, I.	12/16/21	Confer with team re case status and strategy.	.90	180.00
Agwu, I.	12/16/21	Confer with A. Farra re research assignment.	.40	80.00
Shore, R.	12/17/21	Confer with co-counsel re TIG arbitration and summary judgment briefs (0.9); confer with J. Rubinstein, R. Leveridge, A. Gaske and M. Rush re motions (0.7); confer with litigation team re strategy (0.7).	2.30	3,105.00
Shore, R.	12/17/21	Review and comment on Issue #27 brief.	1.50	2,025.00
Hudson, J.	12/17/21	Analyze potential impact of appellate ruling on adversary proceeding.	.70	507.50
Girgenti, J.	12/17/21	Review and tag documents for privilege that are responsive to defendants' request for production of documents.	3.50	1,277.50
Rubinstein, J.	12/17/21	Continue review of District Court opinion re confirmation order (2.6); confer with R. Leveridge, R. Shore and M. Rush re litigation strategy (0.7); confer with Debtors' counsel re TIG arbitration issue (0.9); review revised second set of requests for production to insurers (0.3); confer with A. Gaske, R. Shore, R. Leveridge and M. Rush re motions (0.7); analyze Navigators discovery correspondence (0.3); communicate with S. Sraders re draft discovery letters (0.2); analyze National Union discovery correspondence (0.4); provide edits re revised motion re Issue #27 (0.9).	7.00	5,600.00
Wolf, D.	12/17/21	Revise summary judgment motion re Issue #27.	1.00	700.00
Rush, M.	12/17/21	Review potential summary judgment brief re Issue #27.	1.50	1,012.50
Rush, M.	12/17/21	Confer with Reed Smith re TIG arbitration.	.90	607.50
Rush, M.	12/17/21	Confer with team re potential summary judgment brief re Issue #27.	.70	472.50
Rush, M.	12/17/21	Review potential summary judgment brief re Issue #20.	3.90	2,632.50

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Name	Date	Services	Hours	Amount
Rush, M.	12/17/21	Revise discovery letters to insurers.	.70	472.50
Johnson, K.	12/17/21	Continue revising policy chart.	4.80	1,104.00
Bonesteel, A.	12/17/21	Confer with R. Hoff, A. Guo, and A. Farra re eDiscovery vendors.	.20	75.00
Bonesteel, A.	12/17/21	Review all insurer productions and update production log.	2.00	750.00
Gaske, A.	12/17/21	Revise potential motion re Issue #27 to include additional comments from R. Shore and J. Rubinstein.	1.00	575.00
Gaske, A.	12/17/21	Further revise potential motion re Issue #27 to include certain case law.	.80	460.00
Gaske, A.	12/17/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, and M. Rush re distinguishing certain cases in potential motion on Issue #27.	.70	402.50
Gaske, A.	12/17/21	Review certain cases re potential motion on Issue #27.	.90	517.50
Leveridge, R.	12/17/21	Review District Court opinion vacating confirmation (1.2); confer with team re litigation strategy in light of same (0.7); analyze litigation strategy (1.6).	3.50	4,900.00
Leveridge, R.	12/17/21	Confer with Debtors' counsel re TIG arbitration (0.9); communicate with counsel for UCC re same (0.3); analyze arbitration issues (0.7).	1.90	2,660.00
Leveridge, R.	12/17/21	Confer with team re briefing of motions.	.70	980.00
Leveridge, R.	12/17/21	Review discovery material from Navigators.	.60	840.00
Farra, A.	12/17/21	Confer with R. Hoff, A. Guo, and A. Bonesteel re document collection platforms.	.20	135.00
Carey, C.	12/17/21	Review case filings re Issue #32.	2.40	1,020.00
Carey, C.	12/17/21	Research Issue #32 background materials.	2.90	1,232.50
Sraders, S.	12/17/21	Confer with E. Kaminsky re requests for admission.	.30	172.50
Sraders, S.	12/17/21	Revise draft letters to Gulf and St. Paul, Liberty, and National Union to incorporate comments from J. Rubinstein and M. Rush.	2.60	1,495.00
Sraders, S.	12/17/21	Revise second draft set of requests for production.	.20	115.00
Sraders, S.	12/17/21	Draft letter to Navigators to follow up from meet-and-confer.	2.60	1,495.00
Kaminsky, E.	12/17/21	Confer with S. Sraders re requests for admissions.	.30	150.00
Kaminsky, E.	12/17/21	Continue reviewing documents for privilege for production to insurers.	3.90	1,950.00
Agwu, I.	12/17/21	Continue researching insurer public statements re knowledge of opioid epidemic for upcoming depositions.	2.50	500.00
Leveridge, R.	12/18/21	Review and revise brief from Debtors' counsel.	1.90	2,660.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	12/19/21	Review additional proposed edits to motion re Issue #27 (0.5); revise motion re Issue #20 (2.6).	3.10	2,480.00
Leveridge, R.	12/19/21	Review communications from Navigators re amendment (0.8); communications with co-counsel re same (0.8).	1.60	2,240.00
Sraders, S.	12/19/21	Draft letter to Navigators to follow up from meet-and-confer.	1.00	575.00
Shore, R.	12/20/21	Analyze insurance strategy (2.2); review and comment on potential motion for partial summary judgment re Issue #20 (3.1).	5.30	7,155.00
Hudson, J.	12/20/21	Confer with Debtors re current hosting of documents for reference as adversary proceeding progresses.	.30	217.50
Hudson, J.	12/20/21	Revise proposed stipulation from National Union.	.60	435.00
Girgenti, J.	12/20/21	Continue reviewing and tagging documents for privilege per defendants' request for production of documents.	3.30	1,204.50
Rubinstein, J.	12/20/21	Correspond with plaintiffs co-counsel re responses to communications from Navigators and National Union (0.6); confer with A. Gaske, S. Sraders, and E. Kaminsky re research projects (0.5); revise motion re Issue #20 and provide proposed edits/comments to Debtors' counsel (1.1); provide edits to National Union stipulation re dismissal and answer date (0.3); revise letter to Navigators re discovery (0.6).	3.10	2,480.00
Rush, M.	12/20/21	Revise follow-up letter to Navigators re discovery issues.	.50	337.50
Martinez, S.	12/20/21	Confer with S. Sraders, C. Carey, and S. Ogrey re Issue #58 research.	.30	94.50
Martinez, S.	12/20/21	Review historical research re Issue #58.	.30	94.50
Johnson, K.	12/20/21	Review and revise policy chart.	4.70	1,081.00
Gaske, A.	12/20/21	Confer with J. Rubinstein, E. Kaminsky, and S. Sraders re research topics for certain issue memoranda.	.50	287.50
Gaske, A.	12/20/21	Review comments on potential motion re Issue #27 from Debtors' insurance counsel.	.50	287.50
Leveridge, R.	12/20/21	Communicate with co-counsel re Navigators request to file amended affirmative defenses (0.5); communicate with Navigators counsel re same (0.4).	.90	1,260.00
Leveridge, R.	12/20/21	Review letters from insurers re discovery.	.80	1,120.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	12/20/21	Review comments from Debtors' counsel re draft brief (1.1); communications with co-counsel re briefs (0.2).	1.30	1,820.00
Leveridge, R.	12/20/21	Review draft stipulation re National Union motion under Rule 12(e).	.30	420.00
Ogrey, S.	12/20/21	Confer with S. Sraders, C. Carey, and S. Martinez re Issue #58 research.	.30	69.00
Ogrey, S.	12/20/21	Communicate with K. Johnson re edits to coverage chart re Bermuda, CGL, and Rhodes policies.	.20	46.00
Ogrey, S.	12/20/21	Begin research re Issue #58.	3.30	759.00
Carey, C.	12/20/21	Confer with S. Sraders, S. Martinez, and S. Ogrey re Issue #58 background research.	.30	127.50
Carey, C.	12/20/21	Review Issue #58 background research.	.70	297.50
Carey, C.	12/20/21	Research Issue #58 background materials.	2.80	1,190.00
Sraders, S.	12/20/21	Confer with C. Carey, S. Ogrey, and S. Martinez re research into Issue #58.	.30	172.50
Sraders, S.	12/20/21	Confer with J. Rubinstein, A. Gaske, and E. Kaminsky re research memoranda.	.50	287.50
Sraders, S.	12/20/21	Draft letter to Navigators to follow up from meet-and-confer.	.50	287.50
Kaminsky, E.	12/20/21	Confer with J. Rubinstein, A. Gaske, and S. Sraders re Issue #25.	.50	250.00
Kaminsky, E.	12/20/21	Research Issue #25.	1.40	700.00
Kaminsky, E.	12/20/21	Continue review of documents for privilege and production to insurers.	4.00	2,000.00
Agwu, I.	12/20/21	Continue researching insurer public statements re knowledge of opioid epidemic and coverage under general liability policies.	3.50	700.00
Shore, R.	12/21/21	Confer with Debtors and UCC counsel re summary judgment motions (0.9); analyze strategy re same (1.1).	2.00	2,700.00
Hudson, J.	12/21/21	Analyze options for potential motions for summary judgment.	.40	290.00
Girgenti, J.	12/21/21	Review and tag documents for privilege responsive to defendants' request for production of documents.	3.10	1,131.50
Rubinstein, J.	12/21/21	Review edits to motion re Issue #20 (0.4); confer with co-plaintiff counsel re motions (0.9); update litigation task list (0.6); draft letter to Judge Drain re motions (1.8); confer with R. Leveridge re strategy (0.2); review December 21 letter from National Union re discovery (0.2).	4.10	3,280.00
Rush, M.	12/21/21	Confer with co-counsel re summary judgment briefs.	.90	607.50

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Name	Date	Services	Hours	Amount
Rush, M.	12/21/21	Review order vacating plan and impact on adversary proceeding.	1.60	1,080.00
Martinez, S.	12/21/21	Confer with A. Bonesteel, K. Johnson, S. Colcock and L. Fastenau re discovery tracking protocols.	.90	283.50
Johnson, K.	12/21/21	Confer with S. Colcock, L. Fastenau, A. Bonesteel and S. Martinez re discovery issues.	.90	207.00
Johnson, K.	12/21/21	Review and organize correspondence from G. DiSpirito to plaintiffs.	.10	23.00
Johnson, K.	12/21/21	Review revised policy chart revisions.	2.00	460.00
Bonesteel, A.	12/21/21	Confer with paralegal team re incoming and outgoing document productions.	.90	337.50
Bonesteel, A.	12/21/21	Review all insurer productions to be sent to UCC counsel.	2.10	787.50
Bonesteel, A.	12/21/21	Analyze incoming and outgoing document productions.	1.10	412.50
Gaske, A.	12/21/21	Confer with Debtors' counsel, UCC, J. Rubinstein, R. Leveridge, and M. Rush re potential motions.	.90	517.50
Gaske, A.	12/21/21	Review certain case law requested by UCC re potential motion on Issue #27.	.70	402.50
Leveridge, R.	12/21/21	Confer with plaintiffs' co-counsel re motions practice (0.9); confer with UCC counsel re same (1.3); confer with Debtors' counsel re follow-up issues (1.0).	3.20	4,480.00
Leveridge, R.	12/21/21	Continue reviewing Court order re plan and impact on adversary proceeding.	.80	1,120.00
Leveridge, R.	12/21/21	Review litigation task list.	.40	560.00
Leveridge, R.	12/21/21	Review stipulation and order giving AHC UCC standing to bring insurance claims with Debtors.	.30	420.00
Leveridge, R.	12/21/21	Review discovery-related communications from insurer counsel.	.40	560.00
Fastenau, L.	12/21/21	Confer with A. Bonesteel, S. Colcock, K. Johnson, and S. Martinez re discovery issues.	.90	283.50
Fastenau, L.	12/21/21	Continue researching opioid drug manufacturers and products they produce.	.60	189.00
Fastenau, L.	12/21/21	Research re Issue #58.	3.80	1,197.00
Fastenau, L.	12/21/21	Annotate process for drug manufacturer research and note outstanding Issues.	.50	157.50
Sraders, S.	12/21/21	Revise letter to Navigators to incorporate comments from J. Rubinstein.	.80	460.00
Sraders, S.	12/21/21	Draft letter to NA Elite to follow up from meet-and-confer.	.80	460.00

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Name	Date	Services	Hours	Amount
Colcock, S.	12/21/21	Confer with A. Bonesteel, L. Fastenau, K. Johnson, and S. Martinez re discovery issues.	.90	297.00
Kaminsky, E.	12/21/21	Continue reviewing documents for privilege re production request from insurers.	3.20	1,600.00
Hubbard, B.	12/21/21	Analysis re opioid product and manufacturer research.	1.70	722.50
Agwu, I.	12/21/21	Continue researching insurer public statements re knowledge of opioid epidemic and coverage under general liability policies.	4.00	800.00
Shore, R.	12/22/21	Confer with team re insurance litigation strategy and next steps (1.3); confer with J. Rubinstein, R. Leveridge and M. Rush re discovery issues (0.4); confer with J. Rubinstein re strategy (0.8).	2.50	3,375.00
Shore, R.	12/22/21	Review letter re discovery issues (0.3); review stipulation re National Union (0.1); finish review of Issue #20 brief and send mark-up/draft to P. Breene (0.9).	1.30	1,755.00
Hudson, J.	12/22/21	Confer with team re litigation status and strategy.	1.30	942.50
Hudson, J.	12/22/21	Review draft single-page coverage chart.	.10	72.50
Hudson, J.	12/22/21	Review status of document review.	.10	72.50
Hudson, J.	12/22/21	Finalize National Union stipulation.	.20	145.00
Hudson, J.	12/22/21	Review coverage issued by Insurer #36.	.30	217.50
Girgenti, J.	12/22/21	Review and issue tag National Union supplemental document productions for relevance and responsive documents.	2.40	876.00
Girgenti, J.	12/22/21	Confer with team re adversary proceeding status and strategy.	1.30	474.50
Girgenti, J.	12/22/21	Draft insurance summary re review of Navigators insurance production (0.2); draft insurance summary re review of National Union insurance productions (0.5).	.70	255.50
Rubinstein, J.	12/22/21	Revise discovery letter to National Union counsel (0.8); correspond with Debtors' counsel re same (0.2); confer with team re strategy (1.3); confer with R. Leveridge, R. Shore, and M. Rush re discovery issues (0.4); confer with R. Leveridge re strategy (0.2); confer with R. Shore strategy (0.8); confer with A. Farra re interrogatory responses (0.4); review revised request for admissions to insurers (0.3); revise discovery deficiency letters to insurers (0.3).	4.70	3,760.00
Rush, M.	12/22/21	Confer with team re case status and strategy (1.3); confer with R. Shore, R. Leveridge and J. Rubinstein re discovery issues (0.4).	1.70	1,147.50

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Name	Date	Services	Hours	Amount
Rush, M.	12/22/21	Draft supporting materials for potential summary judgment motion on Issue #14.	2.20	1,485.00
Johnson, K.	12/22/21	Confer with R. Shore, R. Leveridge, J. Hudson, J. Rubinstein, S. Sraders, C. Carey, A. Farra, J. Girgenti, A. Gaske, I. Agwu, A. Bonesteel, S. Colcock, L. Fastenau, S. Ogrey, and B. Hubbard re status and strategy.	1.30	299.00
Bonesteel, A.	12/22/21	Confer with team re case status and strategy.	1.30	487.50
Bonesteel, A.	12/22/21	Review all insurer productions to be sent to UCC counsel.	2.00	750.00
Gaske, A.	12/22/21	Confer with team re strategy and case updates.	1.30	747.50
Gaske, A.	12/22/21	Review exhibit to potential motion on Issue #14 re collecting certain policy language.	.30	172.50
Gaske, A.	12/22/21	Revise potential motion on Issue #27 to include comments from Debtors' counsel.	3.70	2,127.50
Leveridge, R.	12/22/21	Confer with team re insurance adversary proceeding strategy (1.3); confer with J. Rubinstein re strategy (0.2); confer with R. Shore, J. Rubinstein and M. Rush re discovery (0.4).	1.90	2,660.00
Leveridge, R.	12/22/21	Review and revise draft communications with insurer counsel re offensive and defensive discovery issues.	1.20	1,680.00
Leveridge, R.	12/22/21	Analyze proposed motions practice and impact of judicial ruling on same (0.6); review standing stipulation (0.8).	1.40	1,960.00
Leveridge, R.	12/22/21	Communication with Debtors' counsel re TIG.	.40	560.00
Leveridge, R.	12/22/21	Review Judge McMahon opinion.	.80	1,120.00
Ogrey, S.	12/22/21	Continue research re Issue #58.	2.80	644.00
Ogrey, S.	12/22/21	Confer with R. Shore, R. Leveridge, J. Hudson, J. Rubinstein, S. Sraders, C. Carey, A. Farra, J. Girgenti, A. Gaske, I. Agwu, A. Bonesteel, S. Colcock, L. Fastenau, S. Ogrey, and B. Hubbard re status and strategy.	1.30	299.00
Ogrey, S.	12/22/21	Revise coverage chart re Bermuda, CGL, and Rhodes policies to indicate what overlaps occur and coverage type.	.70	161.00
Fastenau, L.	12/22/21	Confer with R. Shore, R. Leveridge, J. Hudson, J. Rubinstein, S. Sraders, C. Carey, A. Farra, J. Girgenti, A. Gaske, I. Agwu, A. Bonesteel, S. Colcock, K. Johnson, S. Ogrey, and B. Hubbard re status and strategy.	1.30	409.50
Fastenau, L.	12/22/21	Review second set of requests for production.	.50	157.50
Fastenau, L.	12/22/21	Continue annotating process for drug manufacturer research and note outstanding issues.	.30	94.50

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Name	Date	Services	Hours	Amount
Farra, A.	12/22/21	Confer with J. Rubinstein re contention interrogatories.	.30	202.50
Farra, A.	12/22/21	Revise coverage chart.	.40	270.00
Farra, A.	12/22/21	Confer with team re litigation status update.	1.30	877.50
Carey, C.	12/22/21	Confer with team re case status and strategy.	1.30	552.50
Carey, C.	12/22/21	Research Issue #32 background materials.	.90	382.50
Carey, C.	12/22/21	Review Issue #32 background materials.	2.90	1,232.50
Sraders, S.	12/22/21	Confer with team re recent developments and strategy for next steps.	1.30	747.50
Sraders, S.	12/22/21	Revise draft letter to Navigators re meet-and-confer.	.50	287.50
Sraders, S.	12/22/21	Draft stipulation re notice.	.30	172.50
Sraders, S.	12/22/21	Finalize and serve second set of requests for production.	2.10	1,207.50
Colcock, S.	12/22/21	Confer with R. Shore, R. Leveridge, J. Hudson, J. Rubinstein, S. Sraders, C. Carey, A. Farra, J. Girgenti, A. Gaske, I. Agwu, A. Bonesteel, K. Johnson, L. Fastenau, S. Ogrey, and B. Hubbard re status and strategy.	1.30	429.00
Kaminsky, E.	12/22/21	Continue reviewing documents for privilege re insurers request for production.	1.60	800.00
Hubbard, B.	12/22/21	Meet with M. Rush, J. Rubinstein, A. Bonesteel, S. Colcock, A. Gaske, I. Agwu, J. Hudson, S. Sraders, R. Leveridge, S. Ogrey, C. Carey, J. Girgenti, K. Johnson, A. Farra, L. Fastenau, and R. Shore re status and strategy.	1.30	552.50
Hubbard, B.	12/22/21	Analyze Debtors' coverage chart.	.50	212.50
Agwu, I.	12/22/21	Confer with team re case strategy.	1.30	260.00
Agwu, I.	12/22/21	Continue researching insurer public statements re knowledge of opioid epidemic and coverage under general liability policies.	2.50	500.00
Gilbert, S.	12/23/21	Confer with team re insurance adversary proceeding status and strategy.	.60	1,020.00
Shore, R.	12/23/21	Review TIG and discovery issues (0.6); confer with S. Gilbert, R. Leveridge, and J. Rubinstein re current status and strategy in light of District Court decision on confirmation (0.6).	1.20	1,620.00
Hudson, J.	12/23/21	Summarize evidence of pre-2020 notice.	.30	217.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	12/23/21	Revise communication to TIG (0.3); confer with R. Leveridge, R. Shore, and S. Gilbert re adversary proceeding strategy (0.6); review status of current motions (0.3); revise letter to National Union re discovery (0.6); communicate with Debtors' counsel re same (0.8); review prior discovery responses as relates to current letters (0.5).	3.10	2,480.00
Gaske, A.	12/23/21	Revise potential motion on Issue #27 re introduction section.	1.30	747.50
Leveridge, R.	12/23/21	Review draft communication from Debtors' counsel re discovery issues (0.2); communicate with Debtors' counsel re same (0.6).	.80	1,120.00
Leveridge, R.	12/23/21	Review communications with insurers counsel re discovery issues (1.1); communications with Debtors' counsel and UCC counsel re same (0.8).	1.90	2,660.00
Leveridge, R.	12/23/21	Confer with S. Gilbert, R. Shore and J. Rubinstein re adversary proceeding strategy / status.	.60	840.00
Kaminsky, E.	12/23/21	Continue review of documents for privilege / production to insurers.	2.50	1,250.00
Shore, R.	12/24/21	Review discovery letter.	.20	270.00
Leveridge, R.	12/24/21	Communications with co-counsel and opposing counsel re discovery matters (0.5); review proposed edits to discovery letters (1.4).	1.90	2,660.00
Rubinstein, J.	12/26/21	Revise correspondence to National Union; correspond with Debtors' counsel re same.	.30	240.00
Hudson, J.	12/27/21	Review projected budget.	.20	145.00
Girgenti, J.	12/27/21	Continue reviewing and tagging documents for privilege responsive to defendants' request for production of documents.	3.70	1,350.50
Rubinstein, J.	12/27/21	Confer with S. Sraders re research issue (0.3); analysis re same (0.2); review summary of Navigators supplemental production (0.2); revise litigation task list (0.1); review certificate of service re 2nd set of request for production (0.1); review summary of National Union 4th and 5th productions (0.4); review industry research re offensive discovery (0.8); review Debtors' counsel comments to motion re Issue #13 (0.3).	2.40	1,920.00
Leveridge, R.	12/27/21	Analyze research projects, offensive discovery and budgetary issues.	1.20	1,680.00
Sraders, S.	12/27/21	Draft certificate of service for second requests for production of documents.	.70	402.50
Sraders, S.	12/27/21	Confer with J. Rubinstein re memorandum re declaratory judgment implications.	.30	172.50

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Name	Date	Services	Hours	Amount
Sraders, S.	12/27/21	Draft follow-up letter from meet-and-confer to NAE and Aspen.	1.30	747.50
Colcock, S.	12/27/21	Finalize and file certificate of service for plaintiffs' second request for production to all defendant insurers.	.60	198.00
Kaminsky, E.	12/27/21	Continue reviewing documents for privilege and production to insurers.	3.00	1,500.00
Shore, R.	12/28/21	Review summary judgment briefs.	2.00	2,700.00
Hudson, J.	12/28/21	Review draft motions for summary judgment.	.10	72.50
Girgenti, J.	12/28/21	Review and tag documents for privilege responsive to defendants' request for production of documents.	3.40	1,241.00
Rubinstein, J.	12/28/21	Revise current version of motion re Issue #27 (1.9); correspond with multiple insurers re discovery deficiencies (0.3).	2.20	1,760.00
Rush, M.	12/28/21	Review letters to insurers re discovery.	.50	337.50
Leveridge, R.	12/28/21	Review letters to insurers re offensive discovery.	.90	1,260.00
Leveridge, R.	12/28/21	Review stipulation between Debtors and Liberty re insurance renewal.	.30	420.00
Leveridge, R.	12/28/21	Review edits to draft motion.	.60	840.00
Leveridge, R.	12/28/21	Review status of legal research.	.40	560.00
Fastenau, L.	12/28/21	Organize insurer meet-and-confer follow up letters for review.	.30	94.50
Sraders, S.	12/28/21	Continue drafting follow-up letter to NAE and Aspen re meet-and-confer.	.90	517.50
Sraders, S.	12/28/21	Finalize letters to National Union, Liberty, Gulf, St. Paul, and Navigators re meet-and-confers.	1.80	1,035.00
Sraders, S.	12/28/21	Draft letter to XL Insurance re meet-and-confer.	.50	287.50
Kaminsky, E.	12/28/21	Continue review of documents re privilege for production to insurers.	2.90	1,450.00
Shore, R.	12/29/21	Review revisions to summary judgment motions (0.5); confer with client re status (1.0).	1.50	2,025.00
Hudson, J.	12/29/21	Review National Union stipulation filing.	.10	72.50
Hudson, J.	12/29/21	Revise draft motions for summary judgment.	1.80	1,305.00
Girgenti, J.	12/29/21	Review and tag documents responsive to defendants' request for production of documents for privilege.	3.80	1,387.00
Rubinstein, J.	12/29/21	Review filed National Union stipulation re motion for more definite statement (0.1); review case law re motion re Issue #27 and provide analysis re same (1.5); review edits to motion re Issue #27 (0.2); initial review of Navigators' supplemental production (0.2); revise motion re Issue #13 (1.6).	3.60	2,880.00

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Name	Date	Services	Hours	Amount
Rush, M.	12/29/21	Revise summary judgment motion on Issue #14.	2.50	1,687.50
Gaske, A.	12/29/21	Review comments from J. Rubinstein, J. Hudson, and R. Leveridge re potential motion on Issue #27.	.50	287.50
Gaske, A.	12/29/21	Review certain policies for language referenced in potential motion on Issue #27.	.40	230.00
Leveridge, R.	12/29/21	Review legal research on insurance contract interpretation.	.70	980.00
Leveridge, R.	12/29/21	Review and revise updated draft of briefs.	2.90	4,060.00
Leveridge, R.	12/29/21	Review communication from co-counsel re redaction in insurer production of underwriting guidelines.	.60	840.00
Leveridge, R.	12/29/21	Communications with team re status of rulings on cases of interest.	.30	420.00
Sraders, S.	12/29/21	Draft letter to XLIA re follow-up from meet-and-confer.	1.50	862.50
Sraders, S.	12/29/21	Draft letter to Zurich re follow-up from meet-and-confer.	1.90	1,092.50
Kaminsky, E.	12/29/21	Draft requests for admission to all insurers.	2.40	1,200.00
Kaminsky, E.	12/29/21	Continue reviewing documents for production to insurers.	2.00	1,000.00
Shore, R.	12/30/21	Review and revise brief re Issue #27.	8.00	10,800.00
Girgenti, J.	12/30/21	Review and tag for privilege documents responsive to defendants' request for production of documents (2.7); review and analyze redactions made in Navigators latest production (0.7).	3.40	1,241.00
Rubinstein, J.	12/30/21	Analyze Navigators supplemental production as relates to discovery issues and motions practice (1.3); revise discovery letters to Zurich, XLIA, and NAE (1.0); review edits to motion re Issue #27 (0.2).	2.50	2,000.00
Rush, M.	12/30/21	Review and revise discovery letters to insurers.	1.10	742.50
Gaske, A.	12/30/21	Review notes from J. Rubinstein on Navigators recent production re potential motion on Issue #27.	.30	172.50
Gaske, A.	12/30/21	Review edits from R. Shore re potential motion on Issue #27.	.30	172.50
Leveridge, R.	12/30/21	Review status of offensive discovery and motions.	1.10	1,540.00
Fastenau, L.	12/30/21	Organize most recent proofs of claim reports for attorney review.	.10	31.50
Carey, C.	12/30/21	Analyze Issue #32 background materials.	2.70	1,147.50
Carey, C.	12/30/21	Research Issue #32 background materials.	2.10	892.50
Sraders, S.	12/30/21	Finish initial drafts of letters to NAE, Aspen, Zurich and XLIA re follow-up from meet-and-confers.	.60	345.00

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Name	Date	Services	Hours	Amount
Sraders, S.	12/30/21	Revise draft letters to N. American Elite and XL to incorporate comments from M. Rush.	.30	172.50
Sraders, S.	12/30/21	Revise draft letter to Zurich to incorporate comments from M. Rush and J. Rubinstein.	.80	460.00
Shore, R.	12/31/21	Review current version of Issue #14 brief (0.7); analyze issues re Issue #27 brief (0.8).	1.50	2,025.00
Rubinstein, J.	12/31/21	Review correspondence from Navigators counsel.	.10	80.00
Leveridge, R.	12/31/21	Review section of Navigators underwriting guidelines.	.30	420.00
Project Total:			988.10	\$ 627,650.00
TOTAL CHARGEABLE HOURS			1,130.20	
TOTAL FEES				\$ 778,466.00

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TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	57.70	1,700.00	98,090.00
Quinn, K.	8.60	1,100.00	9,460.00
Shore, R.	78.50	1,350.00	105,975.00
Holland, P.	8.60	290.00	2,494.00
Hudson, J.	29.30	725.00	21,242.50
Girgenti, J.	63.60	365.00	23,214.00
Grim, E.	5.10	700.00	3,570.00
Rubinstein, J.	92.30	800.00	73,840.00
Wolf, D.	15.00	700.00	10,500.00
Rush, M.	82.10	675.00	55,417.50
Martinez, S.	19.40	315.00	6,111.00
Johnson, K.	34.50	230.00	7,935.00
Bonesteel, A.	27.90	375.00	10,462.50
Gaske, A.	115.60	575.00	66,470.00
Leveridge, R.	81.50	1,400.00	114,100.00
Ogrey, S.	18.80	230.00	4,324.00
Fastenau, L.	54.20	315.00	17,073.00
Farra, A.	8.90	675.00	6,007.50
Carey, C.	86.00	425.00	36,550.00
Sraders, S.	69.30	575.00	39,847.50
Colcock, S.	16.70	330.00	5,511.00
Kaminsky, E.	77.30	500.00	38,650.00
Lloyd, M.	3.50	195.00	682.50
Turner, C.	14.20	195.00	2,769.00
Hubbard, B.	26.00	425.00	11,050.00
Agwu, I.	35.60	200.00	7,120.00
TOTALS	1,130.20		\$ 778,466.00

TASK SUMMARY

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	5.60	5,770.50
A004	Case Administration	9.90	2,080.50
A006	Employment / Fee Applications	9.70	3,344.00
A009	Meetings / Communications with AHC & Creditors	37.10	46,282.50
A019	Plan of Reorganization / Disclosure Statement	79.80	93,338.50
A020	Insurance Adversary Proceeding	988.10	627,650.00

TOTAL FEES AND EXPENSES \$ 778,466.00